Case 2:24-mj-30456-DUTY ECF No. 1 Page D 1 Filed 10/23/24 Page 1 of 23 226-9100

AO 91 (Rev. 11/11) Criminal Complaint Special Agent: Chelsea Williams Telephone: (313) 965-2323

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America
V.
James Nelson Holloway

Case No. Case 2:24-mj-30456

Judge: Unassigned,
Filed: 10-23-2024

CMP USA V. SEALED MATTER (DA)

#### **CRIMINAL COMPLAINT**

On or about the date(s) of	October 21, 2024	in the county of	Wayne	in th
Eastern District of _	Michigan , the defe	endant(s) violated:		
Code Section		Offense Description		
3 U.S.C. § 875(c)	Interstate Co	ommunications of a Threat		
8 U.S.C. § 115	Threat to In	jure a Federal Judge		
This criminal complaint	is based on these facts:			
This criminal complaint ee attached affidavit	is based on these facts:			
•	is based on these facts:			
•	is based on these facts:			
•	is based on these facts:			
•		Cholesa W	llus	
ee attached affidavit		Cholina (September 1988)	Llvs signature	
ee attached affidavit  Continued on the attached sl	neet.	Chelsea Williams, SA, FBI Printed name		
ee attached affidavit	neet.	Chelsea Williams, SA, FBI		d

# <u>AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A COMPLAINT</u> <u>AND AREST WARRANT</u>

I, Chelsea Williams, a Special Agent of the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

#### INTRODUCTION AND AGENT BACKGROUND

- 1. I am a Special Agent with the Federal Bureau of Investigation and have been since September 2019. I am currently assigned as a Special Agent to the FBI's Joint Terrorism Task Force in Detroit, Michigan. As part of my current duties, I investigate federal criminal violations relating to firearms violations, bomb threats, and threats of violence communicated over phone and through the use of the internet, including matters involving violations of 18 U.S.C. § 875(c) (Interstate Communications of a Threat), and 18 U.S.C. § 115 (Threat to a Injure a Federal Judge) (together, the SUBJECT OFFENSES).
- 2. As a result of my participation in this investigation, I submit that there is probable cause to believe that JAMES NELSON HOLLOWAY II (HOLLOWAY), date of birth XX/XX/1991, has committed federal crimes, including the SUBJECT OFFENSES.
- 3. I make this affidavit based upon personal involvement in the subject criminal investigation. I have also been provided with information from other law enforcement agents and officials, including agents and officials from the United States Marshals Service. This affidavit does not contain all the facts developed to

date in the underlying investigation and is being submitted for the limited purpose of establishing probable cause to secure a criminal complaint and arrest warrant.

#### **SUMMARY**

4. In October of 2024, HOLLOWAY sent a series of emails (the Emails) received by the Eastern District of Michigan United States Attorney's Office (USAO) Civil Rights public-facing email account, usamie.civilrights@usa.doj.gov (the Email Account), in which HOLLOWAY threatened to kill EDMI FEDERAL MAGISTRATE JUDGE A. I believe that HOLLOWAY's use of the internet to make the threats to injure EDMI FEDERAL MAGISTRATE JUDGE A violates 18 U.S.C. § 875(c) (interstate communications of a threat) and 18 U.S.C. § 115(a)(1)(B) (threat to injure a United States judge).

### PROBABLE CAUSE

- 5. Since September 2024, the FBI has been investigating James Nelson HOLLOWAY II (\*\*/\*\*/1991) for potential violation of federal firearm laws.
- 6. On September 27, 2024, the FBI received information from Crime Stoppers (the Tip) from a tipster (the Tipster) who reported that an individual named "James Holloway," possibly 35-45 years old, placed an order on Amazon for tactical items totaling over \$2,000 (the Amazon Items). The Amazon Items included: (1) firearms accessories such as rifle mounts and rifle scopes, and (2) other items such as a tactical vest, a night vision optic, a knife holster, multiple

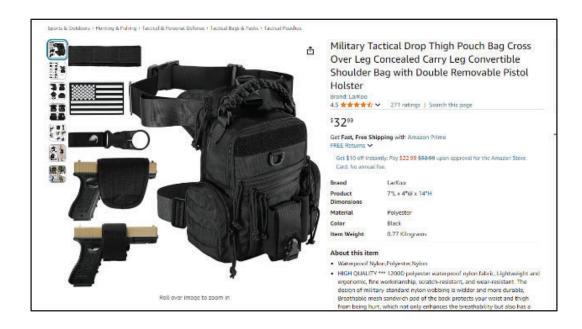
large rolling bags, a helmet light, a Go-Pro camera, and knee/elbow pads. The Amazon Items were delivered to a Staples in Brighton, Michigan (exact address known to law enforcement) (the Brighton Staples). The FBI later received information from Amazon that the purchases referred to by the Tipster totaled approximately \$2,300. As shown below, HOLLOWAY purchased additional items from Amazon, which are included along with the Amazon Items, and were sent to the Brighton Staples. According to the Tipster, the purchaser required a password to pick up the Amazon Items and the purchaser was upset because of being delayed in picking up the Amazon Items.

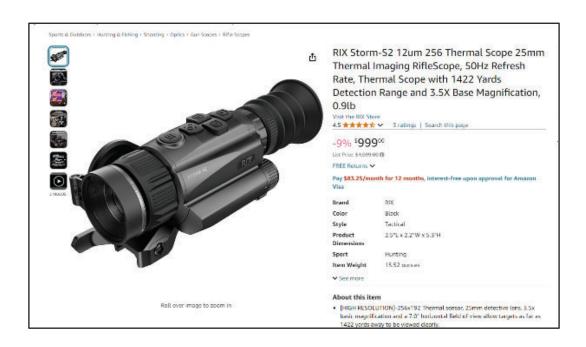
- 7. Database checks identified HOLLWAY as having a date of birth February XX, 1991, which makes him 33 years old (and close to the Tipster's estimation). The investigation also showed that HOLLOWAY provided the Brighton Staples as the mailing address on his Michigan driver's license and a hotel in Warren, Michigan, as his residential address (exact address known to law enforcement). An NCIC check of HOLLOWAY identified a felony conviction for carrying a concealed weapon originating from a 2019 incident in Sterling Heights, Michigan (the 2019 CCW Conviction).
- 8. According to the police reports for the 2019 CCW Conviction, on July 8, 2019, HOLLOWAY's mother made a 911 call and stated that HOLLOWAY had been in a physical confrontation with her. She further stated

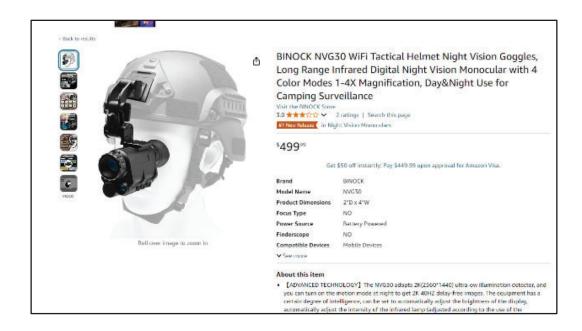
that HOLLOWAY was mentally unstable and had fired off a gun in the yard of the family home. HOLLOWAY was then seen running through a nearby area wearing an all-black outfit, and police arrested him. HOLLOWAY's mother then told police that he had become angry at her and accused her of being part of a group that was out to get him. She said that HOLLOWAY told her he was going to kill her and beat the truth out of her. HOLLOWAY then kicked her in the stomach. She said HOLLOWAY continued to rant about killing people and got some duct tape out of the laundry room and went upstairs. Holloway came back downstairs and she thought she saw something silver in his hand that looked like a gun. She said HOLLOWAY went outside on the front porch and she heard a gunshot.

9. HOLLOWAY's brother also stated that HOLLOWAY had come into his room and threw a roll of duct tape at him and said that they might need it. HOLLOWAY left the room and his brother heard their mother say that HOLLOWAY had a gun. He then heard HOLLOWAY go outside and heard what he thought was a gunshot. HOLLOWAY's father told police that a month prior, one of his handguns, a silver Walther PPK .380, had come up missing. Police arrested HOLLOWAY for CCW, assault and battery, and reckless use of a weapon. Law enforcement also recovered a Walther PPK .380 semiautomatic handgun, with a loaded magazine, and a spent shell casing for .380 ammunition.

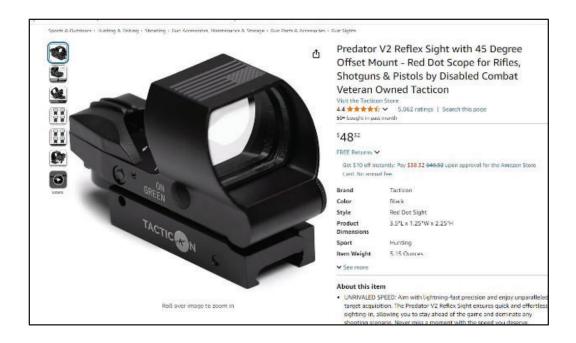
- 10. I reviewed the court records for those charges and they showedHOLLLOWAY's conviction for felony carrying concealed weapon in January2021.
- 11. Following receipt of the Tip, the FBI obtained recent Amazon purchases and subscriber information associated with HOLLOWAY and the mailing address from the Tip. A review of the Amazon records identified an Amazon order placed on September 24, 2024, and delivered to HOLLOWAY at the Brighton Staples. The total of HOLLOWAY's purchases was over \$3,000 (and included additional items beyond those described by the Tipster, and in addition to those listed in the first list of Amazon Items).
- 12. The purchased Amazon Items were consistent with the Tip and included a \$999 thermal rifle scope, optical mounts for weapons, wound coagulant, weapon lights, a military tactical drop thigh pouch bag/concealed convertible shoulder bag with double removable pistol holster, and a night vision monocular. In my training and experience, these firearms accessories are used in conjunction with firearms, and they were consistent with use for both long guns and handguns. Below are screenshots of the Amazon listings for some of the Amazon Items (with the descriptions in the listing).



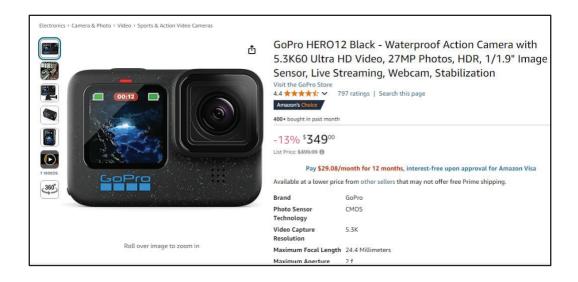








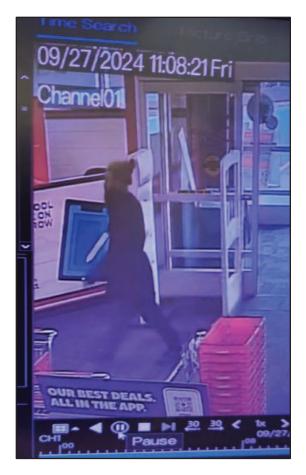








13. On September 27, 2024, the day the FBI received the Tip,
HOLLOWAY picked up the packages from the Brighton Staples. The Staples
Manager identified a photograph of HOLLOWAY as the person who picked up
the Amazon Items on September 27, 2024. Agents reviewed the store's security
camera footage and identified HOLLOWAY entering the store and departing
approximately eight minutes later with a cart full of packages. Here are stills of
HOLLOWAY from the Brighton Staples's security camera footage.





- 14. I know this to be HOLLOWAY because (as shown below) I subsequently spoke in person with him for an extended period. His hair, beard, and clothing in the video appear consistent with his appearance when I spoke with him.
- 15. Through investigation, I was able to learn that HOLLOWAY's registered vehicle (the SUBJECT VEHICLE) was often parked in a parking space in the Inkster Livonia Trucker Parking lot in Livonia, Michigan (the Parking Lot). On September 27, 2024, HOLLOWAY was located at the SUBJECT VEHICLE and law enforcement, including myself, spoke with him in the Parking Lot. The

interaction was captured by body-worn camera and the area was also visible through a chain link fence.

16. During the interaction, HOLLOWAY was standing at the rear of the SUBJECT VEHICLE and was holding an item consistent with a tactical vest (shown here in red circle). Several other dark-colored items were visible inside the SUBJECT VEHICLE.



17. During the interaction, law enforcement asked HOLLOWAY if he knew that certain convicted felons could not lawfully possess firearms, and

HOLLOWAY stated that that "was not the law" and it was "not true" that convicted felons were prohibited from possessing firearms. HOLLOWAY maintained that it was his right to possess firearms under the "supreme law." The Tip was also discussed and HOLLWAY requested the identity of the anonymous Tipster.

18. During the interaction, HOLLOWAY was parked next to a white Wabash truck trailer (the TRAILER). A responding officer captured the license plate for the TRAILER via body-worn camera. A query of the license plate confirmed that the TRAILER was registered to HOLLOWAY. The door to the TRAILER was open before and during the interview, and the interior was recorded by body-worn camera footage (seen here).



- 19. The officer who wore the body-worn camera that recorded the footage informed your affiant that he recalled seeing a black machete in a black case located near the orange Home Depot bucket near the door to the TRAILER.
- 20. Law enforcement maintained surveillance on HOLLOWAY on September 27, 2024, following the interaction at the SUBJECT VEHICLE.

  During the surveillance, HOLLOWAY drove through Livonia, Northville, and Novi. He drove approximately 10 miles-per-hour below the posted speed limit, made multiple U-turns, and entered and then immediately exited various closed businesses without exiting his vehicle. Based on my training and experience conducting surveillance, HOLLOWAY's actions were consistent with countersurveillance.
- 21. On October 1, 2024, at approximately 12:15 AM, a person wearing black tactical gear, a hood, facemask, and gloves approached the front door of HOLLOWAY's parents' house in Sterling Heights, Michigan (exact address known to law enforcement). That person immediately covered the doorbell camera lens with chewing gum, and then rang the doorbell, and called out for "Mr. Holloway." I reviewed the doorbell camera footage and interviewed one of the residents. The occupant said that they had not heard the doorbell and did not come to the door. Later, they found the chewing gum, reviewed the video, and reported the incident to police.

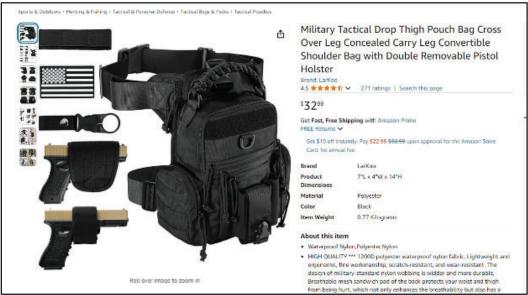
22. Based on my training and experience, I believe that the person in the video was attempting to conceal their identity with a hood, facemask, and gloves, and by covering the doorbell camera. The person appeared to have a red light on a box shaped object on his or her chest. Based upon my review of the footage, I believe the shape of the item and the location of the light is consistent with a GoPro camera with a vest mount (shown here and in red circle and below that is another image of the items HOLLOWAY ordered).





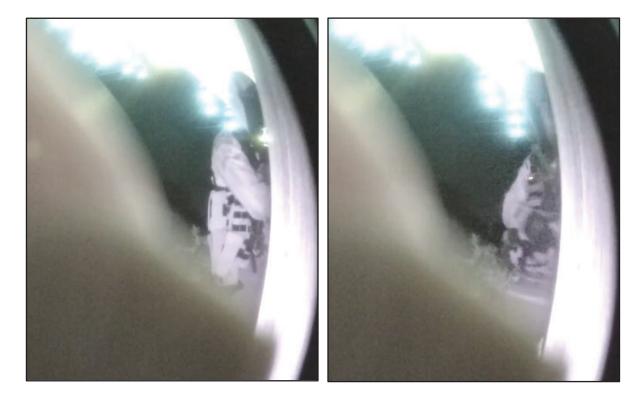
23. The person also appears to be wearing a drop thigh pouch or drop holster, similar to the one from the Amazon Items, strapped to his or her right leg (shown here and in red circle and below that is another image of the items HOLLOWAY ordered). There is also an item hanging down at his right side (also in the red circle) that appears to swing or move in a manner consistent with a long gun.





24. After the individual placed the chewing gum on the lens, the camera shifted to low light mode and the imagery shifted to black and white with high contrast such that the individual's clothing appears to be white (but is still the same black clothing). The chewing gum did not completely cover the camera lens, and additional details of the person's clothing are visible in subsequent footage.

The person appears to be wearing items with molle weave on his chest, consistent with tactical gear and the tactical vest that HOLLOWAY had in his possession on September 27, 2024.



- 25. As noted above, I spoke with HOLLOWAY on September 27, 2024, and the look and voice of the person in the video is consistent with HOLLOWAY.
- 26. Review of a license plate reader (LPR) database identified the SUBJECT VEHICLE in Sterling Heights between approximately 11:00 PM on September 30, 2024 and 1:00 AM on October 1, 2024, which is consistent with the time that the person in the video approached HOLLOWAY's parents' residence. For these reasons, I believe the person in the black tactical gear is

HOLLOWAY. I recently interviewed HOLLOWAY's mother and she said that neither she nor her husband had spoken with HOLLOWAY in years.

- 27. HOLLOWAY does not maintain a consistent residence. The residential address on his driver's license is a hotel in Warren, Michigan. On September 27, 2024, I interviewed the manager of the hotel and confirmed that HOLLOWAY does not maintain a permanent residence at the location. The Tipster also stated that HOLLOWAY also said that he travelled all over the country.
- 28. During the investigation, HOLLOWAY was identified staying at two hotels (first HOTEL 1, and then on approximately October 14, 2024, HOTEL 2) in Warren, Michigan. The investigation also determined that HOLLOWAY was seen carrying large duffle bags into the hotel rooms, which, according to the managers, was unusual for a short-stay hotel.
- 29. On October 18, 2024, law enforcement executed federal search warrants in this investigation on HOLLOWAY's room in HOTEL 2, the SUBJECT VEHICLE, the TRAILER, and HOLLOWAY's person. Agents seized firearm accessories consistent with the Tip, tactical gear, cellular telephones, computers, and digital storage devices pursuant to the warrants. Agents did not find any firearms. Copies of the Search Warrants and receipts for the items seized were provided to HOLLOWAY upon the completion of the search. The Search Warrants

were signed by two U.S. magistrate judges for the U.S. District Court for the Eastern District of Michigan, including EDMI FEDERAL MAGISTRATE JUDGE A.

- 30. On October 22, 2024, the United States Marshal's Service (USMS) informed me that a series of emails had been sent to the Eastern District of Michigan United States Attorney's Office (USAO) Civil Rights email account, usamie.civilrights@usa.doj.gov. Some of the emails were also sent to contact@gao.gov. The emails were reviewed at the USAO and the USMS was notified of the content. In days after the execution of the Search Warrants on October 18, 2024, the Civil Rights email account received over 400 emails from just two email accounts, <a href="mailto:contact@usasupercenters.com">contact@usasupercenters.com</a> and thelawsofnature1@gmail.com.
  - 31. I reviewed a sample of the emails and identified the following threats:
    - a. An email sent October 21, 2024, at 7:20 PM from contact@usasupercenters.com stated: "This retarded magistrate [EDMI FEDERAL MAGISTRATE JUDGE A]. You just got treason charge and commissioned on it."
    - b. An email sent October 21, 2024, at 7:22 PM from contact@usasupercenters.com stated: "But judges can't be killed? Says who? The foundation of this country killed hundred of corrupt judges. They walked into courts and shit then in the head upon unrulements and treason. Upon the laws of nature. You are going to be sentenced in a court of law. To any and all for it."
    - c. An email sent October 21, 2024, at 7:23 PM from contact@usasupercenters.com stated: "Shot them in the head\*"

- d. An email sent October 21, 2024, at 7:25 PM from contact@usasupercenters.com stated: "Yes. I'm going to kill [EDMI FEDERAL MAGISTRATE JUDGE A] in a court of law."
- 32. Based upon my training and experience, I believe that the third email indicated the author's intent to correct a misspelling, which is a common practice. The message "shot them in the head" was a correction of the statement in the original message that read "shit then in the head." The author then followed up two minutes later in a subsequent email that said, "Yes. I'm going to kill [EDMI FEDERAL MAGISTRATE JUDGE A] in a court of law."
- 33. I believe HOLLOWAY is the author of these messages. I believe contact@usasupercenters.com is an account controlled by HOLLOWAY. Legal process served during the investigation to PayPal identified that HOLLOWAY utilized that email address for a PayPal account that was opened by HOLLOWAY in his name in May 2024. The PayPal account also utilized Holloway's telephone number and listed the Brighton Staples as a mailing address. I also believe that HOLLOWAY controls the email account <a href="mailto:thelawsofnature1@gmail.com">thelawsofnature1@gmail.com</a>. Among other reasons, an email sent to the USAO Civil Rights email account on October 19, 2024, from thelawsofnature1@gmail.com begins by stating "This is James Holloway and USA Supercenters Corporation." That email references case 2:24-mc-51191-3, which is the case number for one of the Search Warrants executed on

October 18, 2024, which had been signed by EDMI FEDERAL MAGISTRATE

JUDGE A and was provided to HOLLOWAY at the time of the searches.

34. Additionally in the same email referenced above,

thelawsofnature 1@gmail.com forwarded an email sent on October 19, 2024, from

thelawsofnature1@gmail.com to attyhelp@mied.uscourts.gov. In the forwarded

email, the author begins the email by stating "Hello [EDMI FEDERAL

MAGISTRATE JUDGE A], This is James Holloway and USA Supercenters

Corporation." Therefore, I believe that HOLLOWAY is the person who sent the

emails from the two identified email accounts.

**CONCLUSION** 

35. Based on the foregoing, there is probable cause to believe that

HOLLOWAY has committed federal crimes, including violations of 18 U.S.C. §

875(c) (Interstate Communication of a Threat), and 18 U.S.C. § 115 (Threat to Injure

a Federal Judge).

Chelsea Williams, Special Agent

Federal Bureau of Investigation

Sworn to before me and signed in my presence and/or by reliable electronic means.

Honorable Elizabeth Stafford

United States Magistrate Judge